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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:22-cr-00197-MO

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

ANGELINA NICOLE PINTOR-SCHINDLER,

Defendant.

INTRODUCTION

On May 9, 2022, a truck and trailer containing approximately twenty-nine firearms and ammunition valued at \$60,000.00 were stolen by Alexander Barber and Angelina Pintor-Schindler from the Oxford Suites in Janzen Beach. On May 10, 2022, Angelina Pintor-Schindler was observed driving the stolen truck and trailer and law enforcement attempted to stop her. Ms. Pintor-Schindler eluded police for several miles before she drove onto the I-5 bridge and crashed

into several vehicles. Post Miranda, Ms. Pintor-Schindler admitted that she and the co-defendant were involved in the truck and trailer theft.

FACTUAL BACKGROUND

A. The Offense Conduct

On May 9, 2022, Special Agents with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) met with Victim 1, the manager for Heller Enterprises and Tactical Ordinance, a federal firearms dealer. Victim 1 explained that she participated in the Portland Shooting Sports and Blade show that was from May 5, 2022, through May 8, 2022. On Sunday, May 8, 2022, Victim 1 parked the 2000 Ford F250 truck that belonged to her son, Victim 2. The Ford F250 truck carried the Heller Enterprises and Tactical Ordinance trailer. The trailer contained approximately \$60,000.00 worth of ammunition and firearms. The truck was parked in the parking lot of the Oxford Suites hotel, located at 12226 N Janzen Drive, Portland, Oregon. The trailer had padlocks on the back and side door.

The next morning, on May 9, 2022, Victim 1 and her sons woke and checked on the truck and trailer and saw that the truck and trailer were fine. Victim 1 went back to her hotel room, took a shower and she heard her sons, Witness 1 and Victim 2, yelling that someone was in their truck. Both Witness 1 and Victim 2 ran out after the truck and trailer to prevent them from being stolen, but they were unable to catch them in time.

Victim 1 provided a list of some of the firearms that were stolen which included:

1. Winchester 1894 lever action rifle
2. Browning super posed 12 gage shotgun
3. Winchester model 12, 16 gage shotgun
4. 4- Winchester model 1890 shotguns

5. Miroku 20 gage by side 26" barrel shotgun
6. 3- 1911 handgun frames
7. AR-15 .556 rifle with green stock and sig sauer optic
8. Olympic Arms MPR .308 rifle with scope
9. Arrow precision M5 .308 AR10 18" barrel semi-auto rifle
10. Olympic arms model GL 9mm 16" ss barrel and optic
11. Olympic arms UMR 22-250 24" barrel, green stock with scope
12. Olympic arms AR-15
13. Olympic arms AR-15 20" barrel 22 Nosler
14. AR-15 with Anderson lower
15. Remington 700 300 Win Mag Night Force scope
16. Remington 700 308 Red & Multi thumb hold stock
17. Raffle guns – Airgun Texan .45 caliber

Portland Police Bureau obtained surveillance video from the Oxford Suites hotel parking lot on the date and time where the truck and trailer were stolen. Law enforcement observed a white male, later determined to be Alexander Barber and a female, later determined to be Angelina Pintor-Schindler pull up in a black Subaru. Alexander Barber exited the driver's seat of the Subaru, and Angelina Pintor-Schindler entered the driver's seat. The video showed Alexander Barber approach Victim 2's truck, get into the locked vehicle, and steal the truck and trailer. Ms. Pintor-Schindler, while driving the Subaru, followed Mr. Barber in the stolen truck with the trailer.

On May 10, 2022, Detective Benton of the Vancouver Police Department located the black Subaru involved in the theft of the firearms from Oxford Suites hotel. Law enforcement

found the black Subaru Crosstrek parked in the parking lot of the Best Western Hotel at 1215 N Hayden Meadows Drive, Portland, Oregon. Law enforcement maintained surveillance on the empty black Subaru, until later that day, law enforcement observed a different green Ford F350 truck hitched to the stolen trailer pull into the Best Western parking lot. The green Ford F350 truck was not the truck owned by Victim 2 that was originally hitched to the stolen trailer, but the green Ford F350 truck was also reported stolen. Law enforcement observed that the driver of the stolen green Ford F350 truck hitched to the stolen trailer was Angelina Pintor-Schindler.

Law enforcement watched as Ms. Pintor-Schindler moved from the stolen Ford 350 truck to the black Subaru.



Ms. Pintor-Schindler later returned to the truck and drove the truck and the stolen trailer out of the parking lot. Law enforcement attempted to stop Ms. Pintor-Schindler as she drove the

truck with the stolen trailer, but she repeatedly failed to stop and eluded police for several miles. Portland police officers spiked the tires on the truck Ms. Pintor-Schindler was driving, however she continued driving at a higher and more erratic speed. Law enforcement observed Ms. Pintor-Schindler drive the truck and trailer on curbs and drive through red lights until she began to crash into vehicles on the road while she attempted to enter the I-5 North ramp. Ms. Pintor-Schindler continued driving the truck and trailer until she crashed into four vehicles on the I-5 bridge, closing the bridge due to the number of vehicular accidents. Ms. Pintor-Schindler exited the truck, and began running from police on the bridge, until she was caught and placed under arrest.

After Ms. Pintor-Schindler was placed under arrest on May 10, 2022, she was interviewed. Post-Miranda, Ms. Pintor-Schindler admitted that she and her boyfriend, Alexander Barber, were involved in the theft of the Ford F250 truck and trailer, but she stated that she did not know the trailer was filled with guns and ammunition. Ms. Pintor-Schindler told law enforcement that Mr. Barber disposed of the guns, but that she did not know where the guns were located.

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A. The Charge

Defendant pleaded guilty to a single count of Theft of a Firearm from a Licensed Firearm Dealer, in violation of Title 18, United States Code, Section 922(u).

B. Guideline Computation

The government made the following PSR computations:

Enhancement	Government's Position
Base— USSG § 2K2.1(a)(7)	Base Offense Level 12
Number of Firearms USSG § 2K2.1(b)(1)	+6
Stolen Firearms USSG § 2K2.1(b)(4)	+2
Acceptance of Responsibility— USSG § 3E1.1	-3
Minor Role USSG § 3B1.2	-2
Government's Total Offense Level	15
Resulting Guideline Range	18-24

ARGUMENT

A. Guideline Issues

After the plea agreement letter was sent to Ms. Pintor-Schindler, the government received several Portland Police Bureau reports documenting the damage that Ms. Pintor-Schindler caused to other motorists on the I-5 bridge. Given Ms. Pintor-Schindler's conduct in eluding police on the I-5 bridge as documented in those reports, the government indicated that the court could apply the two-level increase for recklessly creating a substantial risk of death or serious bodily injury to another person in the course of fleeing from law enforcement.

B. Government's Recommended Sentence

The government recommends the low end of the guideline range determined by the court. This term of imprisonment should be followed by three years' supervised release. In the plea agreement letter sent to Ms. Pintor-Schindler on September 7, 2023, it was explained that the court could find that Ms. Pintor-Schindler recklessly created a substantial risk of death or serious bodily injury to another person in the course of fleeing from a law enforcement officer, and that if the court makes that determination, defendant's offense level will increase by 2 levels.

The government's recommendation of the low-end of the guideline range determined by the court is appropriate when balancing the defendant's personal history with the amount of damage caused by Ms. Pintor-Schindler, the costs associated with her conduct, and the number of people affected by her behavior.

The nature and circumstances surrounding Ms. Pintor-Schindler's conduct reveal her disregard for the property of others, her disregard for the safety of other and her total lack of respect for law enforcement. Ms. Pintor-Schindler participated in the theft firearms and ammunition valued at over \$60,000.00. In the process of fleeing from police, she caused several thousand dollars' worth of damage to the vehicles of innocent people driving on the highway.

A low-end term of incarceration takes into account the defendant's personal history including growing up with a mother suffering from drug addiction, the defendant becoming addicted to controlled substances at a young age and being a victim of human trafficking with the nature and seriousness of the offense. A low-end prison term in the guideline range as determined by the court will reflect the impacts the defendant's conduct has had on the people affected by her theft and dangerous driving.

C. Restitution

The government will seek the defendant's payment of restitution to the victims that have claimed restitution in this case.

CONCLUSION

Based on the foregoing, the government respectfully recommends that this Court impose the low end of the guideline range determined by the court, followed by a three-year term of supervised release, subject to the standard conditions.

Dated: December 6, 2023

Respectfully submitted,

NATALIE K. WIGHT
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/s/ Nicole M. Bockelman
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